

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

VANTAGE DRILLING COMPANY,

PLAINTIFF,

versus

HSIN-CHI-SU, AKA NOBU SU,

DEFENDANT.

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CIVIL ACTION 4-12-CV-03131

**AFFIDAVIT OF DAVID M. SHEEREN**

I, David M. Sheeren, hereby declare, pursuant to 28 U.S.C. § 1746, that the following is true and correct to the best of my knowledge, information and belief:

1. I am a member of the Bar of the State of Texas and an associate in the law firm of Gibbs & Bruns LLP. I am counsel for Vantage Drilling Company in the above captioned matter. I make this declaration in support of the Plaintiff's Motion for Leave to Conduct Expedited Discovery to put certain relevant documents before the Court.

2. A true and correct copy of the March 20, 2012, Voting Agreement and Irrevocable Proxy entered into between Vantage Drilling Company and F3 Capital and Hsin-Chi-Su is attached as Exhibit 1.

3. A true and correct copy of the news article written by Lucy Hine, *TMT Boss Forfeits Deposit on 'Elephant' VLCCs*, TRADEWINDS, Sept. 19, 2012, is attached as Exhibit 2.

4. A true and correct copy of the news article written by Youngsoo Han, *Uncertainties Linger*, SAMSUNG SECURITIES, Aug. 30, 2012, is attached as Exhibit 3.

5. A true and correct copy of the news article written by Gillian Whittaker, *Cosmoship In Frame For Handysize Resale*, TRADEWINDS, Sept. 12, 2012 is attached as Exhibit 4.

6. A true and correct copy of the news article written by Alison Leung, *Taiwan's TMT Defaults on Payment for Hyundai Orders Worth \$650 Mln*, REUTERS, Oct. 15, 2012, is attached as Exhibit 5.

7. A true and correct copy of the news article written by Jason O'Connell, *Nobu Gets 18 Months*, TRADEWINDS, Nov. 9, 2012, is attached as Exhibit 6.

8. A true and correct copy of the news article published by HELLENIC SHIPPING NEWS WORLDWIDE, *NewLead Holdings Ltd. Announces Fifth Favorable Arbitration Award Against TMT Bulk Corp.*, Dec. 10, 2011, is attached as Exhibit 7.

9. A true and correct copy of the news article written by Jason O'Connell, *NewLead to Fight On*, TRADEWINDS, Nov. 9, 2012, is attached as Exhibit 8.

10. A true and correct copy of the world-wide freezing injunction Order dated October 6, 2011, accompanied by a cover letter dated December 21, 2012, is attached as Exhibit 9.

11. A true and correct copy of the news article published by PORTNEWS, *Taiwanese Shipping Company Asks Bank to Extend Loan Repayment Period*, Jan. 22, 2013, is attached as Exhibit 10.

12. A true and correct copy of the August 22, 2008 Pledge Agreement between The Royal Bank of Scotland PLC and F3 Capital and TMT Co., Ltd. is attached as Exhibit 11.

13. A true and correct copy of excerpts of a November 9, 2012 e-mail from Robert F. Gray, Jr. to Nobu Su and Benjamin Shaw, along with a true and correct copy of excerpts of a

November 8, 2012 e-mail from Randy Stilley to Robert F. Gray, Jr. which were received by Vantage are attached as Exhibit 12.

14. A true and correct copy of the letter from Robert F. Gray, Jr. to Vantage Drilling Company, dated February 1, 2013 is attached as Exhibit 13.

I declare that the statements set forth above are true and correct to the best of my knowledge, information and belief.

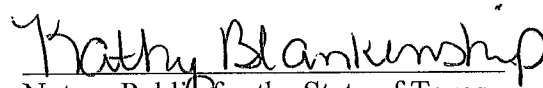
Dated: Houston, Texas

February 26, 2013

  
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David M. Sheeren

SUBSCRIBED AND SWORN TO BEFORE ME this 26th day of February, 2013.



  
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Notary Public for the State of Texas